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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WINNEMUCCA INDIAN COLONY, *et al.*,

Plaintiffs,

v.

UNITED STATES OF AMERICA *ex rel.*
THE DEPARTMENT OF THE
INTERIOR, *et al.*,

Defendants.

Case No. 3:11-CV-00622-RCJ-CBC

**STIPULATION FOR EXTENSION OF
TIME FOR GOVERNMENT TO
RESPOND TO PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES AND
EXPENSES (ECF NO. 305)**

(SECOND REQUEST)

COME NOW Defendants United States of America, Department of the Interior, Bureau of Indian Affairs, *et al.* ("Defendants") and Plaintiffs Winnemucca Indian Colony *et al.*, and hereby stipulate and agree that Defendants may have an extension of time up to and including November 30, 2018 in which to file their response to Plaintiffs' motion for attorneys' fees and expenses (ECF No. 305). Defendants' response is currently due on November 19, 2018.

An 11-day extension is needed because a third attorney recently resigned from the United States Attorney's Office, bringing the total recent resignations by attorneys in defense counsel's office to three. The loss of attorneys has resulted in additional duties for all remaining attorneys in the office. Also, defense counsel recently had a number of work obligations that required her to be out of the office. These obligations prevented her from working on the response. Regardless, she is nearly finished the response, but needs one additional extension to allow her to finalize the

1 document and provide agency counsel with an opportunity to review the proposed filing. In short,
2 Defendants have demonstrated good cause to extend the deadline for responding to Plaintiffs'
3 motion for attorneys' fees and expenses. *See* Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or
4 must be done within a specified time, the court may, for good cause, extend the time...with or
5 without motion or notice if the court acts, or if a request is made, before the original time or its
6 extension expires[.]" (emphasis added)).

7 Defense counsel contacted Plaintiffs' counsel via email, and Plaintiffs' counsel advised
8 that she does not object to Defendants' extension request. This is Defendants' second extension
9 request. Defendants seek this extension request in good faith and not for the purpose of delay.

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11 DATED: November 16, 2018.

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13 DAYLE ELIESON
United States Attorney

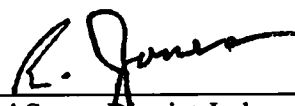
RENO LAW GROUP, LLC

14 s/ Holly A. Vance
15 HOLLY A. VANCE
16 Assistant United States Attorney
Counsel for Defendants

s/ Treva J. Hearne
TREVA J. HEARNE
Counsel for Plaintiffs

17
18 IT IS SO ORDERED.

19
20 DATED: November 31, 2018.


United States District Judge